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16 APPLE INC., A CALIFORNIA CORPORATION

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN JOSE DIVISION

18 In re iPhone Application Litigation

CASE NO. 11-MD-02250-LHK

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANT APPLE INC. TO FILE BILL
OF COSTS AND PLAINTIFFS TO FILE
ANY OBJECTIONS**

1 WHEREAS, on November 25, 2013, this Court issued an Order granting Defendant Apple
2 Inc.'s ("Apple") Motion for Summary Judgment (Dkt. No. 294);

3 WHEREAS, on November 25, 2013, this Court entered judgment in favor of Apple (Dkt. No.
4 296);

5 WHEREAS, on December 6, 2013, pursuant to Civil L.R. 6-2, Apple and Plaintiffs filed a
6 Stipulation and [Proposed] Order to Extend Time for Defendant Apple Inc. to File Bill of Costs and
7 Plaintiffs to File Any Objections (Dkt. No. 297);

8 WHEREAS, on December 9, 2013, the Court granted the Parties' Stipulation (Dkt. No. 298)
9 and entered the following deadlines:

- 10 • Deadline for Apple to file its bill of costs – December 16, 2013; and
- 11 • Deadline for Plaintiffs to file their objections to Apple's bill of costs – January 16,
12 2014;

13 WHEREAS, Apple and Plaintiffs are discussing Apple's costs in order to determine if they
14 can reach agreement, and the Parties therefore have agreed to an additional two-week extension for
15 Apple to file its bill of costs and an extension until January 30, 2014, for Plaintiffs to file any
16 objections to Apple's bill of costs;

17 WHEREAS, the Parties believe that good cause exists for these extensions and hereby
18 stipulate to these extensions pursuant to Civil L.R. 6-2;

19 NOW, THEREFORE, pursuant to Civil L.R. 6-2, and subject to the approval of the Court, the
20 Parties hereby stipulate and request that the Court enter the following deadlines:

21 The deadline for Apple to file its bill of costs is extended to and including **December 30,**
22 **2013.**

23 The deadline for Plaintiffs to file their objections to Apple's bill of costs is extended to and
24 including **January 30, 2014.**

25 The Parties have requested one previous modification to the schedule for recovery of costs or
26 objections thereto. The previous extension was requested in order for Apple to have adequate time to
27 determine all of its costs and for Plaintiffs to have adequate time to evaluate Apple's bill of costs, file
28

any objections thereto, and to satisfy the meet and confer requirement in light of the upcoming holidays. The Parties' requested extension would not unduly delay the resolution of the costs issues, nor would it prejudice the interest of the parties to this litigation.

Respectfully submitted,

DATED: December 16, 2013

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Joshua A. Jessen
JOSHUA A. JESSEN

Attorneys for Defendant
APPLE INC.

DATED: December 16, 2013

KAMBERLAW, LLC

By: /s/ Scott A. Kamber
SCOTT A. KAMBER

Interim Class Counsel for Consolidated Plaintiffs

ATTORNEY ATTESTATION

Pursuant to Civil Local Rule 5-1, I, Joshua A. Jessen, hereby attest that concurrence in the filing of this document has been obtained from Scott A. Kamber.

DATED: December 16, 2013

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Joshua A. Jessen
JOSHUA A. JESSEN

Attorneys for Defendant
APPLE INC.

[PROPOSED] ORDER

Having considered the parties' Stipulation, and good cause appearing, the Court hereby GRANTS the Parties' stipulation. The deadline for Apple to file its bill of costs is extended to and including **December 30, 2013**, and the deadline for Plaintiffs to file their objections to Apple's bill of costs is extended to and including **January 30, 2014**.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

The Honorable Lucy H. Koh
United States District Court Judge